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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 **In re:** **Case No. 09-40099 RLE**  
11 **WILLIAM JOSEPH REYES and** **Chapter 13**  
**LISA ANNE REYES,**  
12 **Debtors.** **MOTION TO MODIFY CHAPTER 13 PLAN**

13 \_\_\_\_\_ /  
14 The above-named debtors apply to the court for an order to modify  
15 their Chapter 13 Plan as follows:

16 Debtors' October & November 2011 plan payments shall be suspended.  
17 Commencing December 2011, debtors will pay \$586.00 per month to the  
18 Trustee. Any plan arrearages shall be forgiven. Unsecured, non-priority  
19 creditors shall be paid on a pro-tanto basis.

20 The modification is sought on the following grounds:  
21 Debtors have lost their jobs, but expect to find employment soon.  
22 Dated: October 12, 2011

23 \_\_\_\_\_ /s/ Patrick L. Forte  
24 Patrick L. Forte  
Attorney for Debtors